

February 16, 2010

Chairman Vincent, members of the EQC.

An issue has recently been raised regarding slash grinders, and whether or not these machines need to obtain the "Air Quality Permit for Portable Sources" from the Montana DEQ.

If this is the case this will be another obstacle for the development and utilization of woody biomass in Montana. When the largest user of biomass in the state closed down late last year our markets are few and far away. Even when this facility was in operation, the value of ground woody biomass is low so it was tough to make grinding projects feasible then; now it is even more difficult. Requiring this permit would just add another cost to the producer not only the price of the permit but the time spent dealing with the permitting process.

The last point that I would like to make is if the slash/non-merchantable timber is not ground up and utilized as a product it WILL BE OPEN BURNED. I guarantee this option will degrade air quality to a far greater extent than the exhaust of a grinder.

Our suggestion is that the EQC consider looking at how to address this issue...possibly through the legislature or through Administrative rule if applicable. HJR 1 was to look at increasing the use of forest and agriculture residues for biomass based energy generation and we certainly view this permit as an obstacle to that goal.

Thank you for your time and consideration,  
Jason Todhunter, Montana Logging Assoc.